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August 1, 2008

Chad Stobbe, Land Quality Bureau
Iowa Department of Natural Resources
Wallace State Office Building
502 East 9th Street
Des Moines, IA 50319

Re: Proposed Amendments to Iowa Administrative Code (IAC) 567 Chapter 108

Attached you will find written comments from Iowa State University Power Plant pertaining to the proposed amendments to Chapter 108. We appreciate you informing us of the pending revisions and giving us a chance to review and submit our suggestions. Please feel free to contact us if you have any questions or need additional information. My number is 515-294-0599.

Sincerely,



Lindsey Wanderscheid
Plant Engineer

c: Jeff Witt
Mike McGraw

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Section 108.4(4) *Coal combustion by-products.*

This section adds more definition and more alternatives for beneficial uses of coal combustion byproducts. It also adds more definition to what products are considered to be coal combustion by-products, including fluidized bed boiler combustion ash. However, most facilities operating fluidized bed boilers do not segregate fly ash and bottom ash. The ash produced from fluidized bed boilers consists of 65-75% fly ash and 25-35% bottom ash.

Section 108.4(4), paragraph a – This section should be modified to include fluidized bed combustion ash. Fluidized bed combustion ash is essentially a combination of coal combustion fly ash and flue gas desulfurization by-products. Fluidized bed combustion ash more resembles these by-products than it does the by-products listed in paragraph b. The beneficial uses for fluidized bed combustion ash in paragraph a are more compatible than those in paragraph b.

Section 108.4(4), paragraph b – Fluidized bed combustion ash should be removed from this section. Fluidized bed combustion ash is not suitable for some of the beneficial uses listed. Historically, using bottom ash for soil stabilization has shown to improve drainage, can help land subsidence, and abate acid water drainage. Why was it removed from being a beneficial use? Can it be reinstated?

There is quite a bit of overlap in the listed beneficial uses in paragraphs a & b. We suggest there be three paragraphs as follows:

- Paragraph a – List the acceptable beneficial uses for all coal combustion by-products
- Paragraph b – List the beneficial uses that are acceptable only for coal combustion fly ash and flue gas desulfurization and flue gas pollution control by-products, including but not limited to, lime, activated carbon, synthetic gypsum and fluidized bed combustion ash.
- Paragraph c – List the beneficial uses that are acceptable only for coal combustion bottom ash, boiler slag and coal gasification ash.

Section 108.4(6) *Wood Ash*

If a generator is burning coal with a minor amount of wood blended with the coal, does that trigger the requirements of this paragraph? How does biomass combustion figure into these discussions?

Section 108.5 - Application Requirements for beneficial use determinations other than alternative cover material

This section indicates beneficial use determinations are good only for one year. Annually resubmitting applications would require significant efforts by the applicants and the department. Does the department anticipate issuing beneficial use determinations for longer periods as long as the by-products and beneficial usage processes do not change?

Section 108.5(2), b, (5), c – This section requires the applicant include a demonstration there is a known market for the intended use of the by-product. It goes on to say that viable markets can be documented by providing a contract to purchase or utilize the by-product. It is unlikely a contract can be produced without having already received a beneficial use determination from the department. This requirement is problematic.